

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RYAN PERRY, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

CABLE NEWS NETWORK, INC., a
Delaware corporation, and CNN
INTERACTIVE GROUP, INC., a Delaware
corporation,

Defendants.

Case No. 1:14-cv-02926-ELR

JOINT MOTION TO EXTEND SCHEDULE

Plaintiff Ryan Perry (“Plaintiff”) and Defendants Cable News Network, Inc. and CNN Interactive Group, Inc. (“Defendants” and, collectively with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby jointly request that the Court enter an Order extending the briefing schedule on Defendants’ motion to dismiss the Amended Complaint as set forth below. In support of this joint motion, the Parties state as follows:

On February 18, 2014, Plaintiff filed his complaint in the United States District Court for the Northern District of Illinois commencing this action (Dkt. 1). Defendants filed their Motion to Transfer or in the Alternative Dismiss the Complaint on April 25, 2014 (Dkt. 18). On June 20, 2014, Plaintiff filed an

Amended Complaint (Dkt. 23). On August 25, 2014, the United States District Court for the Northern District of Illinois granted Defendants' Motion to Transfer (Dkt. 33), and on September 12, 2014, this matter was formally transferred to this Court (Dkt. 35).

On November 3, 2014 the Parties jointly moved to set a briefing schedule for Defendants' motion to dismiss under which Defendants' motion to dismiss would be due no later than November 14, 2014, Plaintiff's response in opposition to that motion would be due no later than December 2, 2014, and Defendants' reply in support of that motion would be do no later than December 12, 2014. On November 14, 2014 Defendants filed their motion to dismiss the Amended Complaint (Dkt. 49). On November 24, 2014 this matter was reassigned to the Honorable Eleanor A. Ross.

On November 21, 2014, Defendants' counsel requested to move the deadline for Defendants to file their reply in support of their motion to dismiss from December 12, 2014 to December 23, 2014, and offered to stipulate to a parallel extension for Plaintiff's response brief. After conferring further, and given the commitments of counsel and the intervening Thanksgiving holiday, Plaintiff agreed. Accordingly, the Parties jointly request a modest extension of the remaining briefing schedule on Defendants' motion to dismiss such that Plaintiff's

response in opposition to Defendants' motion would be due no later than December 13, 2014, and Defendants' reply in support of their motion would be due no later than December 23, 2014. A proposed Order is attached hereto.

Dated: November 25, 2014

By: /s/ J. Dominick Larry

Jay Edelson

jedelson@edelson.com

Rafey S. Balabanian

rbalabanian@edelson.com

Benjamin H. Richman

brichman@edelson.com

J. Dominick Larry

nlarry@edelson.com

Courtney C. Booth

cbooth@edelson.com

EDELSON PC

350 North LaSalle Street, Suite 1300

Chicago, Illinois 60654

Tel: 312.589.6370

Fax: 312.589.6378

Counsel for Plaintiff

Dated: November 25, 2014

By: /s/ Jeffrey G. Landis

Marc Zwillinger (admitted *pro hac vice*)

marc@zwillgen.com

Jeffrey Landis (admitted *pro hac vice*)

jeff@zwillgen.com

Jon Frankel (admitted *pro hac vice*)

jon@zwillgen.com

ZWILLGEN PLLC

1900 M. Street NW, Suite 250

Washington, DC 20036

(202) 706-5205 (telephone)

(202) 706-5298 (facsimile)

James A. Lamberth

Georgia Bar No. 431851

james.lamberth@troutmansanders.com

Alan W. Bakowski

Georgia Bar No. 373002

alan.bakowski@troutmansanders.com

TROUTMAN SANDERS LLP

600 Peach Tree Street, N.E., Suite 5200

Atlanta, Georgia 30308

(404) 885-3000 (telephone)

(404) 962-3900 (facsimile)

Counsel for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RYAN PERRY, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

CABLE NEWS NETWORK, INC., a
Delaware corporation, and CNN
INTERACTIVE GROUP, INC., a Delaware
corporation,

Defendants.

Case No. 1:14-cv-02926-ELR

[PROPOSED] ORDER

Having considered the parties' Joint Motion to Extend Schedule, it is
hereby:

ORDERED that the Joint Motion to Extend Schedule is GRANTED.
Plaintiff shall have until December 13, 2014 to file his response in opposition to
Defendants' motion to dismiss. Defendants shall have until December 23, 2014 to
file their reply in support of their motion to dismiss.

SO ORDERED this ____ day of November, 2014.

ELEANOR L. ROSS
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2014, I electronically filed the foregoing JOINT MOTION TO EXTEND SCHEDULE with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to the following counsel of record:

Jennifer Auer Jordan
THE JORDAN FIRM, LLC
Suite 880
1447 Peachtree Street, N.E.
Atlanta, GA 30309

Benjamin H. Richman
Rafey S. Balabanian
James Dominick Larry
EDELSON PC
350 North LaSalle Street, Suite 1300
Chicago, IL 60654

This 25th day of November, 2014.

/s/ Jeffrey G. Landis